

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WINSTON FARRELL,

07-cv-4052 (LAK)

Plaintiff,

-against-

RULE 26(A)(1) DISCLOSURE

THE CITY OF NEW YORK, and Police Officer
SCHNIDER of the Midtown South Precinct,

Defendants.

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In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiff makes its mandatory disclosure as follows:

A. Witnesses

1. Winston Farrell at 1537 Longfellow Avenue, Bronx, New York 10460 is the plaintiff in this matter and has discoverable information relevant to disputed facts alleged with particularity in the pleadings including the circumstances of the plaintiff's arrest and the plaintiff's mental and physical suffering as a result of the defendants' conduct.
2. Winchele Allan who resides in the United Kingdom, Great Britain is likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings including the circumstances of the plaintiff's arrest.
3. Jesani Farrell at 1537 Longfellow Avenue, Bronx, New York 10460 is likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings including the circumstances of the plaintiff's arrest.
4. Police Officer Schnider of an unknown address, an employee of the New York City Police Department is likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings including the circumstances of the plaintiff's arrest.
5. Three unknown Police Officers of an unknown address, employees of the New York City Police Department, who were working with Police Officer Schnider, are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings including the circumstances of the plaintiff's arrest.

B. Documents

1. Authorization for Medical Records addressed to Dr. Enrico D'Angelo is enclosed with this disclosure. Additionally, a duly executed CPL 160.50(1)(d) is also enclosed.
2. Civilian Complaint Report made on April 4, 2005.

C. Computation of Damages

1. Explanation

Plaintiff's demand for damages is based on Plaintiff's physical injuries, including but not limited to bruising to the wrists, continued pain and suffering, mental anguish, anxiety, and injury to reputation as a result of plaintiff's wrongful arrest and detention.

2. Documents Upon Which Computation Based:

- a. See authorization for medical records described above.

Dated: New York, New York
July 10, 2007

Very truly yours,

THE LAW OFFICE OF MICHAEL FINEMAN, ESQ.

By: /s/
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